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November 12, 2021

VIA ECF and Email

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
Torres\_NYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Bolivarian Republic of Venezuela*,  
Case No. 1:21-cv-02678-AT

Dear Judge Torres:

On behalf of our client, plaintiff Syracuse Mountains Corporation in the above referenced case, we respectfully submit this status letter regarding service of process pursuant to your Honor's September 27, 2021 Memo Endorsement, Dkt. 25.

By way of background, we submitted to the Clerk of the Court the necessary documents for service upon defendant Bolivarian Republic of Venezuela in accordance with Section 1608(a)(4) of the Foreign Sovereign Immunities Act, which the Clerk then transmitted to the Department of State on May 21, 2021, as noted in our June 14, 2021 status letter to the Court, Dkt. 20, and the Clerk's Certificate of Mailing, Dkt. 19.

As explained in our August 13, 2021 Letter to the Court, Dkt. 22, we received the following update from the Department of State via email on August 10, 2021: "[T]he Department received the request, and it is being processed for service through diplomatic channels, but at the moment it has not yet been transmitted. Once that occurs, a certified copy of

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the diplomatic note will be returned to the clerk.” Dkt. 22-2. The Department of State did not provide a definitive timeline for prospective service given the impact of the pandemic but expressed “hope we will have some additional information in a couple of weeks.”

We have since contacted the Department of State on multiple occasions. On September 22, 2021, the Department of State informed us that service “is still in process and it has not yet been served.” Dkt 24-2. We have requested an additional update from the Department of State on multiple occasions over the past few weeks, but have not yet received a response, as reflected in the attached correspondence.

We will continue to follow-up with the Department of State and promptly notify the Court when service of process is complete.

Respectfully,

/s/ Michael DeBernardis  
Michael DeBernardis

Attachment